UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JCORPS INTERNATIONAL, INC.,

Plaintiff,

V.

CHARLES AND LYNN SCHUSTERMAN FAMILY FOUNDATION; SANFORD CARDIN; LISA EISEN; LYNN SCHUSTERMAN; ONEDAY SOCIAL VOLUNTEERING; ELAD BLUMENTAL. Case No. 1:18-cv-09846-AKH

Hon. Alvin K. Hellerstein, U.S.D.J.

Defendants.

NOTICE OF MOTION TO DISMISS THE FIRST AMENDED COMPLAINT

PLEASE TAKE NOTICE that defendants the Charles and Lynn Schusterman Family Foundation, Sanford Cardin, Lisa Eisen, and Lynn Schusterman (the "Foundation Defendants"), by and through their attorneys, Patterson Belknap Webb & Tyler LLP, will and do hereby move this Court, before the Honorable Alvin K. Hellerstein, at the United States District Court House, 500 Pearl Street, New York, NY 10007, for an order pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure dismissing plaintiff's first amended complaint in its entirety and with prejudice. Such motion will be based upon this Notice of Motion, the Memorandum of Law, the Declaration of Harry Sandick and accompanying exhibit, and any further pleadings filed on behalf of the Foundation Defendants, as well as any argument the Court schedules on this motion.

Dated: April 10, 2019

New York, New York

By:

Erik Haas Harry Sandick George B. Fleming

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